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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

KELLY CAHILL and SARA JOHNSTON,
individually and on behalf of others
similarly situated,

Plaintiffs,

v.

NIKE, INC., an Oregon corporation,

Defendant.

Case No.: 3:18-cv-01477-AB

**DEFENDANT NIKE, INC.'S MOTION
TO REDACT A THIRD-PARTY
EMPLOYEE NAME FROM
TRANSCRIPT OF DECEMBER 13,
2024 HEARING**

ORAL ARGUMENT REQUESTED

FILED UNDER SEAL

LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, counsel for Defendant NIKE, Inc. (“NIKE”) conferred in good faith with counsel for Plaintiffs Kelly Cahill, Heather Hender, Sara Johnston, and Lindsay Elizabeth (“Plaintiffs”), and counsel for the Media Organization Intervenors, Insider Inc. *d/b/a BUSINESS INSIDER*, Advance Local Media LLC *d/b/a Oregonian Media Group*, and American City Business Journals, Inc. *d/b/a Portland Business Journal* (collectively the “Intervenors”), regarding this motion and the matters contained herein. The parties were not able to resolve the dispute.

MOTION TO REDACT ADDITIONAL INFORMATION

Pursuant to the Policy and Procedures for the Electronic Filing of Transcripts for the United States District Court for the District of Oregon (“Transcript Policy”),¹ counsel for NIKE hereby moves the Court for an order redacting a certain third-party employee name included in the Court’s December 13, 2024, hearing transcript. As set forth fully in NIKE’s Motion to Redact Third-Party Employee Names from Transcript of October 9, 2024 Discovery Hearing (ECF Nos. 548, 549) (“October 9 Motion”) and NIKE’s Reply in support of the October 9 Motion (ECF No. 570) (“Reply”), the individual at issue submitted internal concerns to NIKE in confidence and with the expectation that the information would be kept as confidential as possible. Further, to the best of NIKE’s knowledge, the individual at issue has not consented to the disclosure of her name or identity in this litigation.

¹ THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON, *Policy and Procedures for the Electronic Filing of Transcripts* <https://ord.uscourts.gov/index.php/filing-and-forms/1367-transcript-information/958-policy-and-procedures-for-the-electronic-filing-of-transcripts> (last accessed Dec. 28, 2024).

Therefore, for the same reasons set forth in the October 9 Motion and Reply, pursuant to the Court's Transcript Policy, NIKE asks the Court for an order redacting the following third-party name from the December 13, 2024, discovery hearing transcript (ECF No. 579):

Page ²	Line(s)	Requested Redacted Language
28	4	██████████
31	25	██████████
Index page 2	n/a	██████
Index page 6	n/a	██████

Date: January 2, 2025

Respectfully submitted,

/s/ Felicia A. Davis

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² NIKE refers to the page number of the transcript.